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October 10, 2022

**VIA ECF**

Hon. Gabriel W. Gorenstein  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312


Re: GateGuard, Inc. v. Goldmont Realty Corp., et al.  
Case No.: 1:20-cv-01609-AJN-GWG  
Request for Extension

Dear Judge Gorenstein:

I represent Plaintiff Ari Teman (“Plaintiff”) in the above-referenced action. As you know, Plaintiff filed a motion to disqualify Simcha Schonfeld (“Mr. Schonfeld”) and his firm from representing defendant Goldmont Realty Corp (“Goldmont”) in this action. Your Honor endorsed a briefing schedule pursuant to which Plaintiff was to file his motion on or before September 1, 2022, Mr. Schonfeld’s opposition was to be filed on or before September 30, 2022, and Plaintiff’s reply was to be filed on or before October 14, 2014.

Unfortunately, since your Honor endorsed the proposed briefing schedule, I have encountered very serious health issues. On September 9, 2022, I was admitted to the emergency room at Capital Health Regional Medical Center in Trenton, NJ (near where I live) following increasingly severe peripheral neuropathy interfering with my balance and mobility. At the hospital my symptoms worsened, and I was deemed a fall risk only able to ambulate with the aid of a walker. On September 22, 2022, I was discharged with a diagnosis of Guillain-Barré syndrome, an autoimmune disorder than results in severe peripheral demyelination and resulting balance and ambulatory issues. My symptoms have worsened, and I may need a wheelchair to move around safely. I have an appointment with my neurologist for October 19, 2022, and may know more then. In the meantime, I am facing difficulties meeting various deadlines and have an appeal brief in the Second Circuit also due on October 14, 2022. Accordingly, I respectfully request an additional ten days to file my reply to Mr. Schonfeld’s opposition. I have conferred with Mr. Schonfeld and he consents to the requested extension. If your Honor grants the request, **Plaintiff’s reply will be due on October 24, 2022.** I will promptly apprise the Court of any further developments regarding my health and I thank your Honor for your courtesies in this matter.

Respectfully Submitted,

  
Eden P. Quainton

cc: All Counsel of Record (via ECF)